

LYNNE C. HERMLE (STATE BAR NO. 99779)  
lchermle@orrick.com  
JOSEPH C. LIBURT (STATE BAR NO. 155507)  
jliburt@orrick.com  
ORRICK, HERRINGTON & SUTCLIFFE LLP  
1000 Marsh Road  
Menlo Park, CA 94025-1015  
Telephone: +1 650 614 7400  
Facsimile: +1 650 614 7401

KATE JUVINALL (STATE BAR NO. 315659)  
kjuvinall@orrick.com  
PAUL RODRIGUEZ (STATE BAR NO. 307139)  
prodriguez@orrick.com  
ORRICK, HERRINGTON & SUTCLIFFE LLP  
355 S. Grand Ave., Suite 2700  
Los Angeles, CA 90071  
Telephone: +1 213 629 2020  
Facsimile: +1 213 612 2499

Attorneys for Defendants  
KIRKLAND & ELLIS LLP, MICHAEL DE VRIES,  
MICHAEL W. DE VRIES, P.C., ADAM ALPER,  
ADAM R. ALPER, P.C., AKSHAY DEORAS,  
AKSHAY S. DEORAS, P.C., LESLIE SCHMIDT,  
LESLIE M. SCHMIDT, P.C., AND MARK FAHEY

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

ZOYA KOVALENKO,

Plaintiff,

v.

KIRKLAND & ELLIS LLP, MICHAEL DE  
VRIES, MICHAEL W. DEVRIES, P.C.,  
ADAM ALPER, ADAM R. ALPER, P.C.,  
AKSHAY DEORAS, AKSHAY S. DEORAS,  
P.C., LESLIE SCHMIDT, LESLIE M.  
SCHMIDT, P.C., AND MARK FAHEY,

Defendants.

Case No. 4:22-CV-05990-HSG

**[PROPOSED] ORDER GRANTING  
ALL DEFENDANTS' REQUEST FOR  
JUDICIAL NOTICE IN SUPPORT OF  
ALL DEFENDANTS' MOTIONS TO  
DISMISS PLAINTIFF'S COMPLAINT**

Date: March 30, 2023  
Time: 2:00 p.m.  
Dept: 2  
Judge: Hon. Haywood S. Gilliam

1 Pending before the Court is Defendants' Request for Judicial Notice in Support of all  
2 Defendants' Motions to Dismiss. Having considered the relevant papers and pleadings in support  
3 of and in opposition to Defendants' request, the Court hereby **GRANTS** Defendants' request and  
4 takes judicial notice of the following documents:

- 5 1. Zoya Kovalenko's ("Plaintiff") 2021 Associate Review;
- 6 2. Plaintiff's offer of employment from Kirkland;
- 7 3. The severance agreement provided to Plaintiff by Kirkland; and
- 8 4. Plaintiff's 2020 and 2021 W-2 Wage and Tax Statements and paystubs.

9  
10 **IT IS SO ORDERED**

11 Dated: \_\_\_\_\_

\_\_\_\_\_  
HON. HAYWOOD S. GILLIAM  
U.S. DISTRICT COURT JUDGE